

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

| | | |
|--|---|-------------------------|
| Anthony Ross, | : | Civil Action No.: _____ |
| | : | |
| Plaintiff, | : | |
| v. | : | |
| | : | |
| Monarch Recovery Management, Inc.; and | : | COMPLAINT |
| DOES 1-10, inclusive, | : | |
| | : | |
| Defendants. | : | |
| | : | |

For this Complaint, the Plaintiff, Anthony Ross, by undersigned counsel, states as follows:

JURISDICTION

1. This action arises out of Defendants' repeated violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* ("FDCPA"), and the invasions of Plaintiff's personal privacy by the Defendant and its agents in their illegal efforts to collect a consumer debt.

2. Venue is proper in this District pursuant to 28 U.S.C. § 1331(b), in that the Defendants transact business in this District and a substantial portion of the acts giving rise to this action occurred in this District.

PARTIES

3. The Plaintiff, Anthony Ross ("Plaintiff"), is an adult individual residing in Cincinnati, Ohio, and is a "consumer" as the term is defined by 15 U.S.C. § 1692a(3).

13. Monarch assured Plaintiff it would remove his number from their system.
14. Nonetheless, Monarch continued placing calls to Plaintiff causing a great deal of frustration and annoyance to Plaintiff.

C. Plaintiff Suffered Actual Damages

15. The Plaintiff has suffered and continues to suffer actual damages as a result of the Defendants' unlawful conduct.
16. As a direct consequence of the Defendants' acts, practices and conduct, the Plaintiff suffered and continues to suffer from humiliation, anger, anxiety, emotional distress, fear, frustration and embarrassment.

COUNT I

VIOLATIONS OF THE FDCPA 15 U.S.C. § 1692, ET SEQ.

17. The Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though fully stated herein.
18. The Defendants' conduct violated 15 U.S.C. § 1692b(1) in that Defendants contacted third parties for purposes other than to confirm or correct location information.
19. The Defendants' conduct violated 15 U.S.C. § 1692d in that Defendants engaged in behavior the natural consequence of which was to harass, oppress, or abuse the Plaintiff in connection with the collection of a debt.
20. The Defendants' conduct violated 15 U.S.C. § 1692d(5) in that Defendants caused a phone to ring repeatedly and engaged the Plaintiff in telephone conversations, with the intent to annoy and harass.

TRIAL BY JURY DEMANDED ON ALL COUNTS

Dated: June 7, 2019

Respectfully submitted,

By: Jody B. Burton

Jody B. Burton, Esq.
Bar No.: 71681
LEMBERG LAW, L.L.C.
43 Danbury Road, 3rd Floor
Wilton, CT 06897
Telephone: (203) 653-2250
Facsimile: (203) 653-3424
Attorneys for Plaintiff